Exhibit 11

Contains Confidential & Attorneys' Eyes Only Portions Bound Separately

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Page 1
 1
                         Allan
 2
               UNITED STATES DISTRICT COURT
                SOUTHERN DISTRICT OF NEW YORK
 3
       SANDRA GUZMAN,
                                     )
 4
                                     )
                   Plaintiff,
 5
                                    ) 09CIV9323
                  vs.
 6
                                    ) (BSJ(RLE)
       NEWS CORPORATION, NYP HOLDINGS,)
       INC., d/b/a THE NEW YORK POST, }
       and COL ALLAN, in his official )
 8
       and individual capacities,
 9
                  Defendants.
       10
11
     (Contains Confidential & Attorneys' Eyes Only Portions Bound Separately)
12
          VIDEOTAPED DEPOSITION OF COLIN ALLAN
13
                    New York, New York
14
15
                Tuesday, February 14, 2012
16
17
18
19
20
21
22
23
      Reported by:
24
      Philip Rizzuti
25
      JOB NO. 46188
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1	Allan	1	Allan
1		2	1
2	cartoon, who is Sean Delonas?	3	
3	A. He is the cartoonist.	i	Q. When you read this E-mail for the
4	Q. Who created that cartoon?	4	very first time did you know that Ms. Guzman
5	A. Correct.	5	had raised objections to the cartoon?
6	Q. Did Mr. Delonas give you that	6	MR. LERNER: Objection.
7	cartoon to approve before it was published?	7	Mr. Thompson, I am looking, this is an
8	MR. LIPPNER: Objection.	8	E-mail, it has been 100 or 200 addresses
9	MR. LERNER: Objection.	9	on it, so it takes a while to go through.
10	Q. You can answer?	10	But I don't see Col Allan's name as a
11	A. Yes.	11	recipient of this particular E-mail,
12	Q. Did you approve it before its	12	so
13	publication?	13	MR. THOMPSON: I understand that
14	A. Yes.	14	Mr. Lerner, but he has already said that
15	Q. Did any other editor at the New	15	this is the E-mail that he saw after the
16	York Post approve that cartoon before its	16	person came into his office.
17	publication?	17	MR. LERNER: I am describing for
18	A. No.	18	clarity.
19	Q. So you made the decision?	19	MR. THOMPSON: But he has already
20	A. Yes.	20	stated that he has seen this before.
21	Q. Solely your decision?	21	Q. Mr. Allan, did you know when you
22	A. Yes.	22	looked at Ms. Guzman's E-mail the day you
23	Q. Ms. Guzman stated in her E-mail, I	23	learned about it that she had raised
24	have raised my objections to management,	24	objections to management about the cartoon?
25	Sandra Guzman. Do you see that?	25	A. I don't recall.
Ĕ-	Page 64		Page 65
,	Allan	1	Allan
1		2	
2	Q. How did you react when you read	3	
3	her E-mail?	I	Q. Did Jennifer tell you before or
4	A. React; what does that mean?	4	after you saw this E-mail reflected in Exhibit
5	Q. Well were you happy, were you	5	2?
6	unset?	6	A. I don't recall.
7	A. I was disappointed.	7	Q. Is Jennifer Jehn the only person
8	Q. Why were you disappointed?	8	that you recall telling you that Sandra Guzman
9	A. I felt that if she was troubled by	9	raised complaints about the cartoon?
10	the cartoon that she might have raised those	10	A. Yes.
11	concerns with the people that she worked for	11	Q. In February of 2009 Joe Rabinowitz
12	and with before she did so publicly.	12	was Sandra Guzman's direct supervisor; is that
13	Q. Do you know if she did raise her	13	correct?
14	concerns about the cartoon with any editor at	14	A. Correct.
15	the New York Post?	15	Q. Did Mr. Rabinowitz tell you that
16	A. I don't recall.	16	she had complained to him about the cartoon?
17	Q. Do you know if she raised the	17	A. I don't recall.
18	concerns about the cartoon to anyone in human	18	Q. Well let me ask you, you said you
19	resources?	19	were disappointed in Ms. Guzman, wouldn't you
20	A. Yes.	20	remember if Joe Rabinowitz told you that she
21	Q. Who did she raise her concerns to?	21	had complained about it?
22	A. Jennifer Jehn.	22	A. I am sorry, I don't recall.
23	Q. How do you know that she raised	23	Q. So as you sit here now you don't
24	the concerns about the cartoon with Jennifer	24	recall ever speaking or communicating with Joe
25	Jehn?	25	Rabinowitz about the fact that Sandra Guzman